

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

**MICHAEL BROWN and  
JEANETTE BROWN (spouse)**

**Plaintiffs,**

**v.**

**TOWNSHIP OF BERLIN POLICE  
DEPARTMENT, EDWIN GRAMLEY,  
WAYNE BONAFIGLIO,  
ATTORNEY GENERAL  
OF THE STATE OF NEW JERSEY, ABC  
CORPORATIONS 1-5, AND JOHN DOES  
, 1-20 (fictitious names)**

**Defendants,**

**Civil Action No. 08-cv-3464  
(RBK-AMD)**

**AMENDMENT TO CIVIL  
ACTION COMPLAINT  
JURY TRIAL DEMANDED**

**Plaintiffs, Michael Brown and Jeanette Brown, residing at 4 Pine Terrace, West Berlin,  
County of Camden, State of New Jersey, by way of Complaint against the Defendants, says:**

**FIRST COUNT**

- 1. On or about July 18, 2006, the Plaintiff Michael Brown, a private citizen, was in need of emergency care.**
- 2. On or about July 18, 2006, the co-plaintiff, Jeanette Brown was caused to call emergency service (911) on behalf of her husband.**
- 3. Shortly thereafter, two police officers from the Township of Berlin Police Department arrived. Rather than providing the plaintiff, Michael Brown with medical assistance, said officers instead harassed plaintiff, Michael Brown, his wife, and the plaintiff's daughters. accusing the plaintiffs of having illegal drugs in the parties home.**
- 4. Upon the arrival of emergency personnel, said Township of Berlin Police Officers continued to obstruct the emergency technicians in providing emergency care to the plaintiff, Michael Brown in violation of his civil rights.**

**3. The Defendants further caused plaintiffs undue emotional stress in violation of 42 USCA Section 1983.**

**4. As a direct and proximate result of the conduct of the Defendants, individually and together caused the plaintiff, Michael Brown and his wife, Jeanette Brown to suffer severe and painful injuries, said injuries causing them great pain and suffering, incapacitating him from his usual work and activities, necessitating him receiving medical treatment and will, in the future, cause him great pain and suffering, and will in the future, necessitate him receiving medical treatment and will, in the future, cause him to avoid his usual work activities.**

**WHEREFORE, Plaintiffs, Michael Brown and Jeanette Brown, his wife, demand Judgment against the Defendants, Township of Berlin Police Department, Edwin Gramley, Wayne Bonafiglio, and John Does 1-20, individually and jointly for damages, punitive damages, together with interest and costs of suit.**

### **SECOND COUNT**

**1. Plaintiffs, Michael Brown and Jeanette Brown, his wife, repeats the allegations of the first count and incorporates same into this Count as if fully set forth at length herein.**

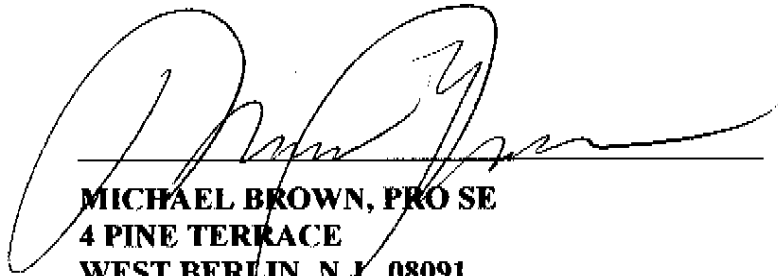
**2. At all relevant times mentioned, the Township of Berlin Police Department was under the jurisdiction of the Attorney General of the state of New Jersey and/or ABC Corporations 1-5.**

**3. At all relevant times mentioned, the Township of Berlin Police Department, Edwin Gramley, Wayne Bonafiglio, and John Does 1-20 were the responsibility of the agents, employees, servants, contractors, and representatives of the Defendants, Attorney General of the State of New Jersey and ABC Corporations, 1-5, whose identities cannot reasonably be ascertained at this time.**

4. As a direct and proximate result of the conduct of the Defendants, Attorney General of the State of New Jersey and ABC Corporations, 1-5, fictitious names, by and through the acts of their employees, agents, contractors, and/or representatives, the Plaintiffs, Michael Brown and Jeanette Brown, his wife suffered severe and painful injuries, said injuries causing them great pain and suffering, incapacitating him from his usual work and activities, necessitating him receiving medical treatment and will, in the future, cause him great pain and suffering, and will in the future, necessitate him receiving medical treatment and will, in the future, cause him to avoid his usual work and activities.
- WHEREFORE, Plaintiffs, Michael Brown and Jeanette Brown, his wife demand Judgment against Defendants, Attorney General of the State of New Jersey and ABC Corporations, 1-5, fictitious names, for damages, punitive damages, together with interest and costs of suit.

### **THIRD COUNT**

1. Defendants did commit on numerous occasions, by willful and deliberate actions; "Follow plaintiffs in TOWNSHIP OF BERLIN POLICE DEPARTMENT VEHICLES via local roadways and local business parking facilities with the intent to cause further "Emotional Distress to occupants of Plaintiffs vehicle. These actions were executed in an "aggressive manner" and at an extreme proximity to Plaintiffs vehicle. Case in point: In such a manner that a license plate or the occupant could not be identified. Very close and unsafe.
1. Defendants did commit on "two" occasions, the act of parking "two" TOWNSHIP OF BERLIN POLICE DEPARTMENT VEHICLES directly adjacent to Plaintiffs home with the intent to cause further emotional distress to Plaintiffs.
2. Plaintiffs contend that these actions were committed by unidentified members of TOWNSHIP OF BERLIN POLICE DEPARTMENT were "Terroristic in Nature" and that these actions were for the purpose of having Plaintiffs either withdrawal or to prevent Plaintiffs from taking any further legal actions against Defendants.



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**JEANETTE BROWN, PRO SE**  
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May 27<sup>th</sup>, 2009

US District Court  
Clerks Office

To Whom It May Concern,

Enclosed are ~~four~~ <sup>3</sup> copies of PLAINTIFF'S amendment to complaint.  
Docket no. Civil Action no. 08-cv-3464 (RBK-AMD).

Also enclosed is one postage paid envelope for PLAINTIFF'S. Please stamp received  
and mail as addressed.

*copy*

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Michael Brown, Pro Se  
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RECEIVED

MAY 29 2009

ANN MARIE DONIO  
U.S. Magistrate Judge